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Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATION COMMISSION
Washington, D.C. 20554

In the Matter of)

Review of the Policy Implications)
of the Changing Video Marketplace)

MM Docket No. 91-221

COMMENTS OF THE OFFICE OF COMMUNICATION
OF THE
UNITED CHURCH OF CHRIST

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August 24, 1992

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SUMMARY

The scope of this proceeding has changed from a broad review of the effectiveness of the regulatory scheme to one that focuses exclusively on how to improve station profitability. The multiple ownership reforms proposed by the NPRM are not supported by the record of public interest comments and ignore the failure of similar past initiatives.

The Commission originally welcomed commenters to recommend steps that should be taken to "promote the...goals of localism, diversity, nationwide availability, and broadcasting in the public interest." Notice of Inquiry, para. 2. In previous comments, the Office of Communication provided a quantitative analysis of how repeal of the 7-7-7 rule weakened the ability of the Commission to rely upon structural regulation to protect the public interest. The goals of localism, diversity, and public interest programming can be best served by abandoning efforts to modify the multiple ownership rules and by establishing standards for public interest broadcasting.

Studies have shown that subsequent to the decision to increase the caps to 12-12-12,

- 1) industry profits plummeted 79 percent, and expenses rose 56 percent, (Section III A infra);
- 2) control of all forms of media (television, newspapers, books, movies, and cable TV) has been increasingly concentrated in the hands of a few multi-media conglomerates, (Section III B infra);
- 3) group owners have relied increasingly upon syndicated sources to supply news and public affairs. Individually owned stations - whose existence is threatened by the Commission's proposed action - aired the majority of local programming, (Section III C infra).

Rather than address the factual evidence submitted for the record, the NPRM brushes them to the side and promotes "beliefs" and unfounded propositions. The NPRM fails to establish any logical nexus between public interest goals and repeal of the 12-12-12 rule.

Significantly, the NPRM overlooks an extensive study submitted by the Office of Communication which documents the decline of news and public affairs since TV deregulation. The study challenges the premise that marketplace forces can ensure adequate amounts of the public interest programming and has a direct bearing on this proceeding which threatens to weaken the last vestiges of structural regulation.

The Office of Communication recommends the adoption of the following public interest programming standards in order to correct the adverse effects of "marketplace regulation":

- 1) Minimal guidelines for locally produced non-entertainment programming. The standards should set forth both quantitative and qualitative requirements that licensees and citizens can easily interpret for the purpose of evaluating programming performance;
- 2) A standardized format for issues-programs lists;
- 3) A clear definition of the term "issue-responsive programming";
- 4) A requirement that stations provide a narrative statement on each issue selected to be addressed by means of issue-responsive programming, as well as an explanation of the procedure used to identify significant issues of social importance facing the community;
- 5) a set of penalties ranging from financial forfeitures to license revocation for licensees that violate any of the standards listed above.

The Office of Communication also proposes that the Commission maintain its current duopoly rules. The merger of various

stations in local markets will hinder the competitive ability of individually owned stations - the primary source of local programming. As the NPRM correctly notes, mergers are designed to "offer the widest possible audiences to advertisers". Instead of promoting effective competition, relaxation of the duopoly rules will cause the fatality of stations that traditionally narrowcast to marginal (eg. minority) markets. Such stations would no longer be able to attract advertisers if group owners are permitted to consolidate market shares previously under the control of separate entities.

The Office of Communication also maintains that the Commission's present time-brokerage policy does not adequately prevent the transfer of programming control or enable the public to participate in the license renewal process. Time brokerage agreements should require brokered stations to demonstrate programming control by preparing issues-programs lists based upon community ascertainment and the programming efforts of the brokered station.

The Commission should also resolve many unanswered questions pertaining to the license renewal process. In the absence of programming logs and any records of locally produced programs potential petitioners-to-deny are prevented from effectively evaluating the programming performance of brokered stations. If the Commission is to continue to rely upon citizens to monitor its licensees, it must clarify the license renewal standards and provide citizens with the means to document their observations.

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COMMENTS OF THE OFFICE OF COMMUNICATION
OF THE
UNITED CHURCH OF CHRIST

I. INTRODUCTION.

The Office of Communication of the United Church of Christ ("OC/UCC") respectfully submits the following Comments in response to the Commission's Notice of Proposed Rulemaking, FCC 92-209, released June 12, 1992 ("NPRM").

OC/UCC is a telecommunications public interest advocate that has represented the views of the general public on numerous occasions before the Commission since 1956. The following Comments are intended to represent the views of OC/UCC and the general viewing audience.

II. THE NPRM IGNORES THE PUBLIC'S INTEREST IN LOCALISM, DIVERSITY, AND INFORMATIONAL PROGRAMMING AND FOCUSES EXCLUSIVELY ON IMPROVING INDUSTRY PROFITS.

This proceeding began with a request for "wide-ranging comments" about the state of the video marketplace and recommendations that can advance the goals of localism, diversity, and

public interest programming.¹ The NOI specifically welcomed commenters to address,

whether changing the multiple ownership rules impacts any prior Commission decisions that deleted or modified rules or policies which were based upon the principles of diversity, localism..."

NOI para. 14. (emphasis provided).

as well as,

what steps, if any, we should take to ensure that our policies and rules continue to promote the Commission's goal of localism, diversity, nationwide availability, and broadcasting in the public interest.

NOI para. 2 (emphasis provided).

In response, OC/UCC stated that this proceeding necessarily required a review of the Commission's 1984 policy to rely increasingly upon structural regulation and subsequent decisions, such as repeal of the 7-7-7 rule, that have weakened the effectiveness of that policy. The effect of the Commission's "attic-to-basement" review would otherwise "eliminate the last vestiges of structural policies originally intended to safeguard localism and diversity...". OC/UCC Comments at 18.

OC/UCC is dismayed that the NPRM focuses exclusively upon ways in which to increase profits and ignores past deregulatory decisions that have adversely affected the public interest. TV deregulation² and repeal of the 7-7-7 rule are directly related to the subject matter of this proceeding. Both of these policies

¹. Notice of Inquiry, 6 FCC Rcd 4961 (1991) ("NOI") para. 1.

². Commercial TV Stations, 98 FCC 2d. 1076 (1984) ("Commercial TV Stations").

directly impact upon diversity of viewpoint,³ localism,⁴ and the financial status of the television industry.⁵

Even more significantly, the NPRM fails to address record evidence of the decline in public interest programming. OC/UCC included in its earlier comments a survey of informational programming from 1974 to 1989 that shows that the quantity of news and public affairs has declined since TV deregulation.⁶ This survey, in addition to a related study of five TV markets,⁷ completely discredits the belief that "increased economies of scale could permit the production of new and diverse, including locally produced, programming." NPRM para. 11.

Based on a random sampling of 82 markets, the survey found that,

- 1). The amount of locally produced public affairs has

³. The NPRM limits its analysis to the number of media outlets and ignores the increasing concentration of commonly owned outlets. The NPRM fails to take into account the decline in the number of separately-owned outlets. OC/UCC Comments filed November 21, 1991 ("OC/UCC Comments") at 15 - 16; Section II, B infra.

⁴. The record of this proceeding contradicts the belief that group ownership will lead to "new and diverse, including locally produced, programming." NPRM para. 11. Studies have shown that group ownership results in increased syndicated programming. OC/UCC Comments at 12; Section II, C, infra.

⁵. The decision to repeal the 7-7-7 rule was partly based on the assumption that it would improve station profitability by providing economies of scale. In fact, industry expenses have increased more rapidly since repeal of the 7-7-7 rule. OC/UCC Comments at 2; Section II A infra.

⁶. "The Public Cost of TV Deregulation: A Study of the Decline of Informational Programming on Commercial TV" appended to OC/UCC Comments submitted Nov. 21, 1991.

⁷. OC/UCC Comments at 12.

declined to approximately 5 minutes per day during the 6:00 am to midnight day-part. The amount of local public affairs per day in 1989 was 14 minutes less than in 1979;

2) Locally produced public affairs has been supplanted by an increasing amount of nationally syndicated programming such as "Oprah Winfrey", "A Current Affair", and "Geraldo". This trend is most pronounced in large markets (eg. the top 10 ADI markets). Local public affairs in large markets dropped by half of one percentage point from its 1.38 percentage level in 1984;

3). National news declined 7 percentage points during the prime time day-part and increased approximately 2 percentage points during the 6:00 am to midnight day-part;

4). Local news during prime time has declined almost 3 percentage points to a level less than the average amount of local news in 1974. Local news during the 6:00 am to midnight day-part has increased, but remained below its level in 1974.

The study points out not only the dearth of news and public affairs programming, but also the increased trend towards less local programming. As the Commission pursues its "attic-to-basement" review, at the very least it must examine the effects of multiple ownership on public interest programming.

This proceeding offers the opportunity to evaluate the Commission's theory on marketplace regulation - especially decisions that have undermined the goals of structural regulation. The NPRM proposes to push ahead with new structural deregulation, but neglects to analyze the results of similar past initiatives. The pattern of FCC policy decision-making leaves one to only conclude that it has placed a higher priority on industry profitability than on an informed public opinion.⁸

⁸. In other proceedings the Commission has reneged on its commitment to evaluate the general effects of TV deregulation and the record-keeping obligations of licensees. Commercial TV

The OC/UCC survey clearly disputes the premise that marketplace incentives are sufficient to produce adequate amounts of public interest programming.⁹ The incentives of the marketplace merely incline stations to base program decision-making on ratings that will generate advertiser revenue. Decisions driven by the need to attract advertiser dollars overlook the obligation to respond to ascertained community needs and problems.¹⁰

Commenting on the pressure to get good ratings, a broadcast executive once said,

Maybe we're moving from 'shock radio' to 'shock TV' and getting larger audiences, but really, is that what success as a broadcaster is all about?
 "Broadcasters Discuss Their Tough Choices", Electronic Media, February 18, 1988 at 49.

A TV program director was reported to have been concerned that "economic forces have caused many in the industry to change their standards and accept programming they wouldn't normally carry." Specifically referring to program-length commercials the program director said "[t]he marketplace can force a station into accepting some of these syndicated shows just to meet the bottom

Stations paras. 3 and 90. Post-Card Renewal 49 RR2d 740, 749-753 (1981). See also Black Citizens for a Fair Media v. FCC, 719 F.2d 407, 416 (DC Cir., 1983); Commercial TV Stations at 1112.

⁹. When the Commission repealed the requirement for quantitative programming guidelines, it predicted an "acceptable" 2 percent decrease in local programming. Commercial TV Stations at 1085 n. 28. In actuality, local public affairs has declined 14 minutes per day since 1979 and 1989.

¹⁰. TV deregulation did not relieve broadcasters of their public interest obligations. "[W]e are by this Order retaining the obligation of licensees to provide programming that responds to issues to concern to the community." Commercial TV Stations at 1077.

line." "We just keep jamming the same old garbage down the viewer's throat", according to another executive. id.

This proceeding provides the opportunity to balance the adverse effects of deregulation with clearly defined public interest standards and a commitment to aggressive enforcement. OC/UCC in previous comments,¹¹ recommended the adoption of the following standards:

- 1) Minimal guidelines for locally produced non-entertainment programming. The standards should set forth both quantitative and qualitative requirements that licensees and citizens can easily interpret for the purpose of evaluating programming performance;
- 2) A standardized format for issues-programs lists;¹²
- 3) A clear definition of the term "issue-responsive programming";
- 4) A requirement that stations provide a narrative statement on each issue selected to be addressed by means of issue-responsive programming, as well as an explanation of the procedure used to identify issues of critical social impor-

¹¹. OC/UCC Comments at 24.

¹². Petitioners-to-deny recently expended over \$20,000 to evaluate the programming performance of the six television stations in Philadelphia. A large proportion of the expense was due to missing information and the inability to tabulate non-standardized data. According to the researcher who helped to prepare the petition-to-deny,

In order for members of the general public to exercise their right to participate fully in the broadcast license renewal process, the establishment and enforcement of standardized and uniform reporting requirements that meet specific requirements for accuracy, detail, specificity, clarity and public access is essential.

Petition to Deny, In Re License Renewal Applications of Commercial Television Stations Serving Philadelphia, PA., File No. BRCT-890332KG et al. filed July 3, 1989, Study page 14.

tance facing the local community;¹³

5) a set of penalties ranging from financial forfeitures to license revocation for licensees that violate any of the standards listed above.

OC/UCC urges the Commission to follow through on the original broad agenda of this proceeding and examine those issues that directly affect the viewing audience. Programming that is locally produced and that addresses critical issues of concern to the community should be the primary objective of the Commission. Rules that bear on the right to own multiple licenses cannot be properly formulated without examining marketplace forces that influence the programming performance of broadcasters.

III. THE RECORD OF THIS PROCEEDING SUPPORTS THE CONCLUSION THAT THE INTEREST OF THE VIEWING PUBLIC WOULD BE DISSERVED BY INCREASING THE NATIONAL GROUP OWNERSHIP CAPS.

Despite comments of the industry to the contrary, the record evidence of this proceeding shows that diversity and localism will be adversely affected by lifting the national ownership ceiling. Even though economies of scale may result from such action, it will not offset declining profits and will only benefit large group owners interested in extending their control over the marketplace.

¹³. Stations typically provide a generic list of issues facing the community (eg. Business/Economy, Government, Minority/Ethnic, Education, Women, Youth & Elderly). Such generalized descriptions do not comply with the letter and spirit of the Section 73.3527 of the Commission's rules which was intended to enable the Commission to evaluate a licensee's responsiveness to issues of local public concern and allow citizens to effectively participate in the license renewal process.

A. INCREASING THE NATIONAL OWNERSHIP CAPS IN THE PAST WAS FOLLOWED BY A SIGNIFICANT DECLINE IN INDUSTRY PROFITS.

Altering the national ownership restrictions is justified, according to the Commission, if "television stations [could] compete more effectively. NPRM para. 11. The NRPM not only neglects critics of this premise, but also fails to review recent history which shows that repeal of the 7-7-7 rule did not advance the goal of effective competition.

Financial data compiled by the National Association of Broadcasters (NAB) indicates that past increases in the ownership ceiling did not prevent the economic decline of large numbers of television stations. A comparison of financial trends with the growth of group ownership between 1979 and 1989 shows that expenses increased 56 percent and profits declined 79 percent subsequent to the repeal of the 7-7-7 rule. Prior to repeal, profits grew 79 percent (see Exhibit I).¹⁴

The fact that losses in the broadcast industry cannot be attributed to regulatory restrictions is further underscored by the ability of broadcasters to generate increased revenues despite competition from cable TV. Both the NAB and the Office of Plans and Policies (OPP) report increased revenues in each

¹⁴. Exhibit I was originally submitted as part of OC/UCC Comments denoted as Exhibit IX. All figures have been obtained from the NAB Financial Reports for 1980, 1985, and 1990. The number of group owners for the years surveyed was obtained from the group broadcaster listings of the 1980, 1985, 1990 editions of the Broadcast Yearbook.

segment of the industry between 1984 and '89.¹⁵

The undisputed record of this proceeding supports the conclusion that past initiatives have failed to increase profits by means of relaxed ownership ceilings. The Commission should, therefore, abandon its current effort to modify the national ownership rules.

**B. RAISING THE GROUP OWNERSHIP CEILING WILL SUBSTANTIALLY
CONTRIBUTE TO CONCENTRATION OF OWNERSHIP.**

As noted in our previous comments, the Commission's conclusion that a modification of the ownership ceiling is justified by a proliferation of media outlets is misguided. OC/UCC Comments at 14. In fact, media ownership has become increasingly concentrated in fewer hands.

According to one scholar, 23 corporations currently control most of the daily newspapers, magazines, television, books and motion pictures.¹⁶ As a result of wide-ranging takeovers and acquisitions this number decreased from 46 in 1981. While access to a "captive audience" makes it easier for media giants to sell advertising, it also threatens our system of democracy which is based upon the ability to access information from diverse and separately owned sources.

A survey by OC/UCC found that twenty large group owners

¹⁵. OC/UCC Comments at 4. Office of Plans and Policy Working Paper # 26, Broadcast Television in a Multichannel Marketplace, DC 91-817, 6 FCC Rcd 3993 (1991) at 41, Table 12.

¹⁶. The Media Monopoly, Dr. Ben H. Badikan, Beacon Press, Boston, 3rd edition at 4 and 21.

control 1000 newspapers and magazines, 96 TV stations, and 94 radio stations. OC/UCC Comments at 15. In considering whether to relax the national ownership rule, the Commission must consider the impact that such action would have on the number of separately-owned media and not the raw number of outlets - the vast majority of which are commonly-owned.

C. RAISING THE GROUP OWNERSHIP CAPS WILL RESULT IN LOSS OF PROGRAMMING DIVERSITY.

OC/UCC, in earlier comments, presented a survey that compared the programming of individual and group owned stations in 1984 and 1989. The survey found that group owners aired more syndicated news and public affairs after the decision to increase the caps to 12-12-12. Individually owned stations, on the otherhand, aired more local public affairs and significantly increased the amount of their local news (see Exhibit II). OC/UCC Comments 12 - 14. The survey contradicted the Commission's belief that group owners invest savings from economies of scale into locally produced programming.

The NPRM questioned the validity of the survey, but presented no evidence to the contrary. The NPRM also called for additional comments, including "the experience of specific group owners," to add to the record of the proceeding. NPRM para. 11 note 23.

The Commission's refusal to accept the findings of OC/UCC's survey contradicts the logic of its NPRM. The benefits of multiple ownership to group owners are economic efficiencies. Such efficiencies are realized to the extent that redundant costs

are eliminated. The news and programming operations of acquired stations are routinely consolidated resulting in reduced coverage of issues of importance to individual communities.

According to the NPRM, the objective of "regional groups of stations under common ownership....[is to offer] a wider audience to advertisers and share joint and common costs...". NPRM para. 17. Under the Commission's proposed policy, costs savings and "wider audiences" are maximized at the expense of localism. However, marketplace forces do not support the conclusion, implied by the NPRM,¹⁷ that increased economies of scale necessarily lead to increased local programming.

The unfounded beliefs that characterize the NPRM appear to be based upon a pre-determined script as opposed to authentic research and analysis. If the Commission seeks to advance the economic interests of broadcasters, it should not attempt to do so based upon public interest justifications. Such attempts only belie an agency charged with upholding the interest of the general public and make a mockery of public participation in the rule-making process.

IV. ANY RELAXATION OF THE DUOPOLY RULES WILL RESULT IN THE DEMISE OF INDEPENDENTLY OWNED STATIONS.

The Commission's 1984 decision opposing modification of the duopoly rule was premised upon the understanding that "the most

¹⁷. The Commission "continu[es] to believe that these increased economies of scale could permit the production of new and diverse, including locally produced, programming." NPRM para. 11. note omitted.

important idea markets are local".¹⁸ The NPRM, in an irrational departure from previous Commission wisdom, proposes several alternative modifications to the duopoly rules. It is OC/UCC's position that any modification that permits station combinations within local markets will undermine Commission policy favoring competition and ownership diversity.

The purpose of any merger is not only to achieve economies of scale, but also, as the NPRM correctly notes, to "[o]ffer a wide audience to advertisers". NPRM para. 17. As stations combine and control of the marketplace is transferred to fewer owners, individually-owned stations will be placed at a competitive disadvantage. As noted above, individually-owned stations produce significant amounts of local informational programming. Section III C supra. As the market share decreases for such stations it will become increasingly difficult for them to generate advertiser revenue - causing them eventually to go dark.

As Commissioner Barrett noted in the related radio proceeding,

[T]here is no diversity protection; larger stations can combine. The remaining smaller stations can be squeezed out even before they get a chance to merge....Clearly diversity will suffer within radio markets as larger station groups grow and wipe out smaller players.
Dissent of Commissioner. Barrett, Revision of Radio Rules and Policies, Report and Order, MM Docket No. 91-140 at 10 and 11.

Instead of fostering programming from diverse sources, the proposed policy will result in the fatality of small and in-

¹⁸. 1984 Amendment to Section 73.3555 at paras. 32 and 60; Ownership Reconsideration Order, 100 FCC 2d 74, 82 (1985).

dividually owned stations. OC/UCC, therefore, urges the Commission to maintain the current rules restricting station ownership in local markets.

V. ANY MODIFICATIONS OF THE TIME BROKERAGE RULES MUST INCLUDE SAFEGUARDS THAT WILL PREVENT LOSS OF PROGRAMMING CONTROL AND PRESERVE THE EFFECTIVENESS OF THE PETITION-TO-DENY PROCESS.

The NPRM seeks comments on whether to restrict television brokerage agreements if the Commission decides to relax the local ownership rules. Irrespective of whether the local ownership rules are relaxed, OC/UCC maintains that the Commission should use the opportunity of this proceeding to correct important flaws in its cross-interest policy.

The Commission's present policy prohibits the transfer of programming control,¹⁹ but is void of any safeguards designed to ensure that such transfers of control do not take place. It is insufficient that brokered stations are merely required to reserve the legal right to exercise programming control.²⁰ A reserved legal right implies that the duty to perform a public service is optional. This conflicts with the responsibility of each licensee to serve its community. Nothing less than a policy that affirmatively requires brokered stations to perform their duties as public trustees can adequately safeguard the public interest.

The Commission has opted to place its reliance upon market-

¹⁹. Reexamination of Commission's Cross-Interest Policy, 4 FCC Rcd 2208 (1989) ("Cross-Interest Policy Statement") at 2214; Letter to Roy. R. Russo, 5 FCC Rcd 7586 (1990)

²⁰. Letter to Roy. R. Russo, 5 FCC Rcd 7586 (1990)

place forces to protect the public interest.²¹ However, the absence of competitive market conditions - especially in small markets where most brokerage arrangements occur - justifies the need for effective regulation. Specifically, brokerage agreements should include,

- 1) an affirmative obligation on the part of the brokered station to exercise programming control; and
- 2) a provision requiring brokered stations to demonstrate programming control by preparing issues-programs lists based upon the community ascertainment and responsive programming efforts of the brokered stations.

As the Commission explores the possibility of revised time-brokerage agreements for television, it should also clarify its policy in the context of challenged and unchallenged license renewal applications. Some of the outstanding questions that have not been addressed by the Commission²² include, a) can a prima facie case for denial of license renewal be established against a brokered station that never exercises its obligation to control its programming (eq. carries programming exclusively from the brokering station)? b) Are there circumstances in which a brokered station would not be entitled to a renewal expectancy? and c) What kinds of programming activities constitute less than

²¹. Competitive [marketplace] conditions require a station that decides to broker its time to another to remain alert to the needs of its audience or risk losing some of that audience to a competitor, with a resultant decrease in ratings and revenue.

Cross-Interest Policy Statement para. 37.

²². The following questions were raised but left unanswered in the recent radio review proceeding. Revision of Radio Rules and Policies, MM Docket No. 91-140 para. 29; Comments of OC/UCC in MM Docket No. 91-140 filed August 6, 1991 at 15.

what is minimally required in terms of programming control?

These questions and others must be resolved in order to preserve the public's right to participate in the license renewal process. Due to the fact that stations are no longer required to maintain programming logs or document what portions of their programming is locally produced, potential petitioners-to-deny are unable to evaluate the programming performance - specifically the programming control - of brokered stations. The Commission cannot rely on citizens to monitor the performance of its licensees and at the same time deny them the ability to document their observations.

VI. CONCLUSION.

For the above reasons OC/UCC maintains that the Commission should abandon its proposal to modify its multi-ownership and duopoly rules and broaden the scope of this proceeding to include an examination of the public interest programming of television stations.

Respectfully Submitted,



Anthony L. Pharr

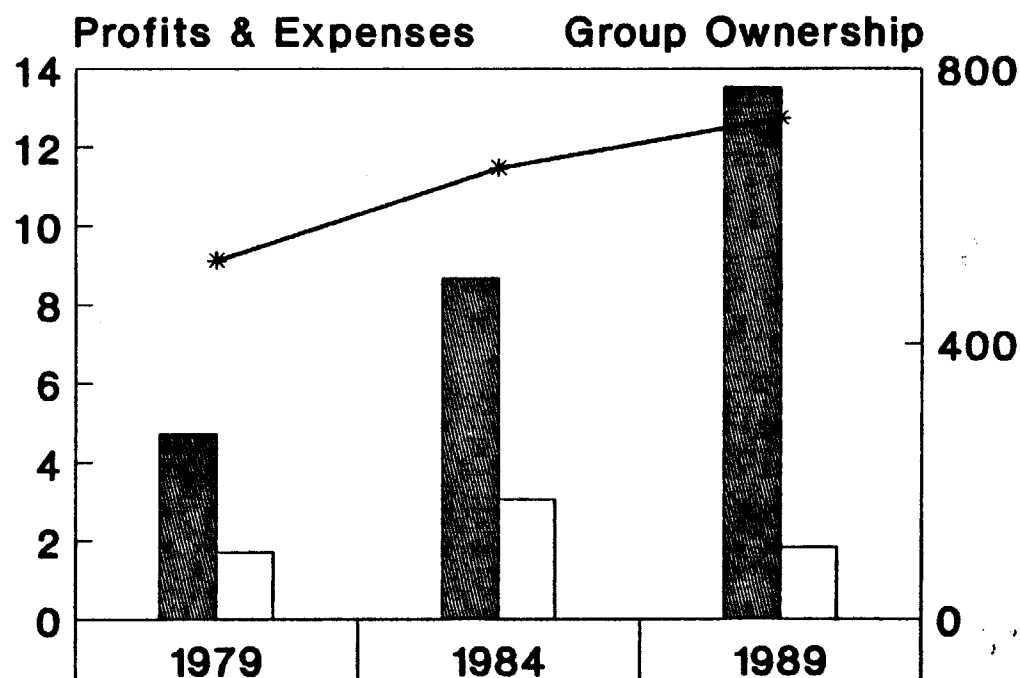
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August 24, 1992

EXHIBITS

GROWTH OF GROUP OWNERSHIP COMPARED TO TV PROFITS AND EXPENSE

1979 - 1984 - 1989



EXPENSES (millions) 
 PROFITS (millions) 
 GROUP OWNERSHIP 

1979

1984

1989

4.721

8.665

13.525

1.706

3.064

1.833

520

655

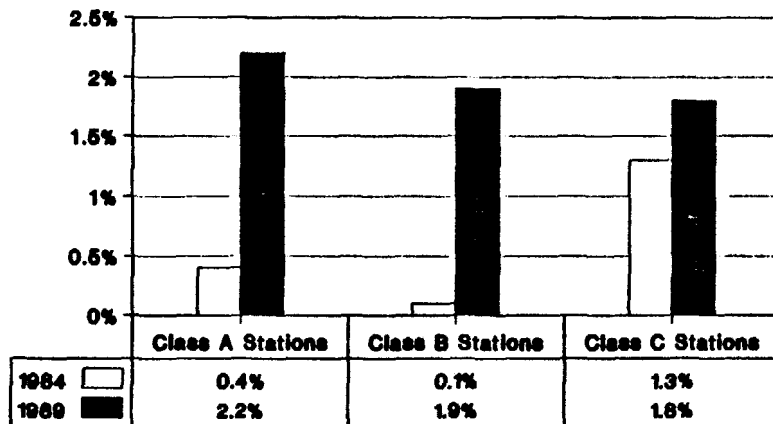
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Data: NAB Financial Reports; FCC Annual Reports; Broadcast Yearbook. Profit and expense figures are industry averages.

EXHIBIT *II*

A

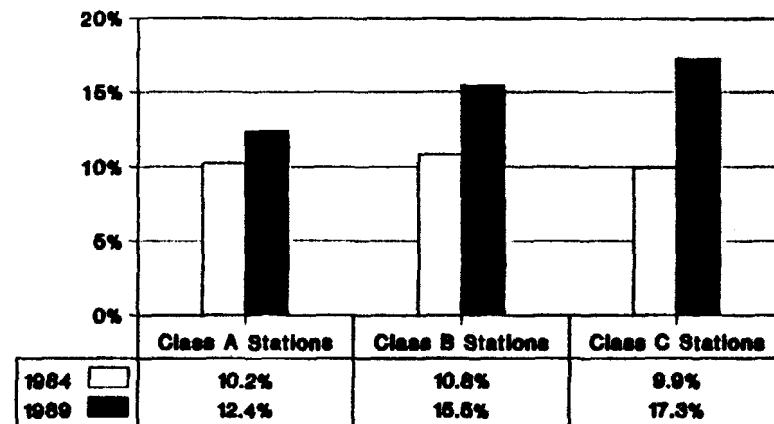
COMPARISON OF LOCAL PUBLIC AFFAIRS BY OWNERSHIP CHARACTERISTICS



A = individually owned in '84 and '89.
B = ownership smaller in '89 than in '84.
C = ownership larger in '89 than in '84.

B

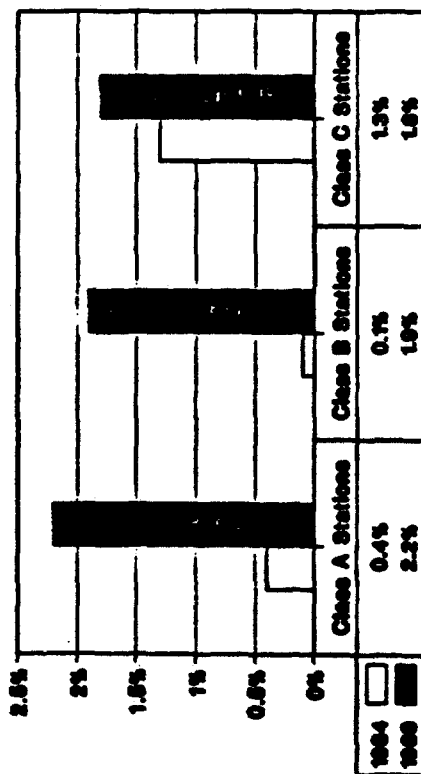
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A

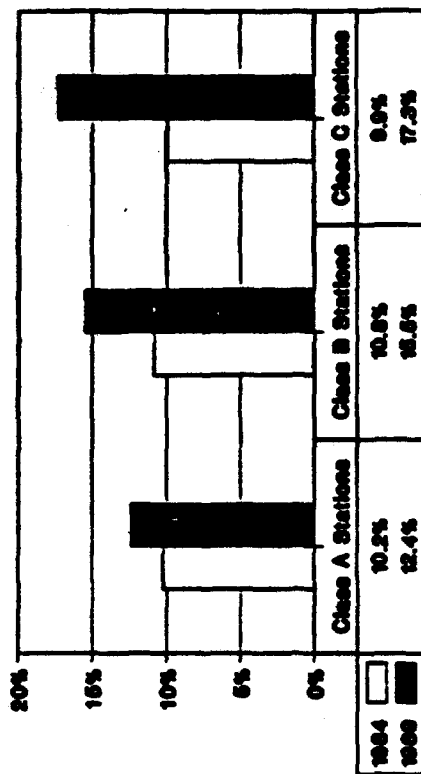
COMPARISON OF LOCAL PUBLIC AFFAIRS BY OWNERSHIP CHARACTERISTICS



A = Individually owned in '64 and '69.
B = ownership smaller in '69 than in '64.
C = ownership larger in '69 than in '64.

B

COMPARISON OF NATIONAL PUBLIC AFFAIRS BY OWNERSHIP CHARACTERISTICS



A = Individually owned in '64 and '69.
B = ownership smaller in '69 than in '64.
C = ownership larger in '69 than in '64.